| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8 | MICHELE BECKWITH Acting United States Attorney MATHEW W. PILE, WSBN 32245 Associate General Counsel Office of Program Litigation, Office 7 Social Security Administration LILLIAN J. LEE, NY 5449764 Special Assistant United States Attorney 6401 Security Boulevard Baltimore, Maryland 21235 Telephone: (206) 615-2733 E-Mail: lillian.j.lee@ssa.gov Attorneys for Defendant  |  |  |
|--------------------------------------|--|--|--|
| 9                                    | UNITED STATES DISTRICT COURT   |  |  |
| 10                                   | EASTERN DISTRIC  | CT OF CALIFORNIA                               |  |
| 11                                   |  | Case No. 2:24-CV-00793-DMC                     |  |
| 12                                   | MARINA THOMPSON,   |  |  |
| 13                                   | Plaintiff,   | STIPULATION AND ORDER FOR AN EXTENSION OF TIME |  |
| 14                                   | vs.  |  |  |
| 15                                   |  |  |  |
| 16                                   | COMMISSIONER OF SOCIAL SECURITY, )   |  |  |
| 17                                   | Defendant.   |  |  |
| 18                                   |  |  |  |
| 19                                   | Pending the Court's approval, IT IS HER  | REBY STIPULATED, by and between the parties    |  |
| 20                                   | through their respective counsel of record, that the time for Defendant to respond to Plaintiff'   |  |  |
| 21                                   | Motion for an Award of Attorney Fees Pursuant to Equal Access to Justice Act (ECF No. 25) b  |  |  |
| 22                                   | extended thirty (30) days from July 1, 2025, up to and including July 31, 2025.  |  |  |
| 23                                   | This is the Defendant's first request for an extension. Defendant respectfully requests this   |  |  |
| 24                                   | extension to allow sufficient time to respond to Plaintiff's motion. Defendant is exploring th   |  |  |
| 25                                   | possibility of settling this matter and need more time to see if the parties can reach an agreemen   |  |  |
| 26                                   | on attorney fees. Plaintiff's counsel, Jesse S. Kaplan, has no objection to this motion.   |  |  |
| 27                                   |  |  |  |
| 28                                   |  |  |  |
|                                      | I and the second |  |  |

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| 1   |                       |     | Respectfully submitted,   |
|-----|-----------------------|-----|---|
| 2   | Dated: June 30, 2025  | By: | /s Jesse S. Kaplan*   |
| 3 4 |                       | ·   | (*as authorized via e-mail on June 30, 2025) JESSE S. KAPLAN Attorney for Plaintiff |
| 5   | Dated: June 30, 2025  |     | MICHELE BECKWITH  |
| 6   | Dated: Julie 30, 2023 |     | Acting United States Attorney   |
| 7   |                       |     | MATHEW W. PILE<br>Associate General Counsel   |
| 8   |                       |     | Social Security Administration  |
| 9   |                       | By: | <u>/s Lillian J. Lee</u><br>LILLIAN J. LEE  |
| 10  |                       |     | Special Assistant U.S. Attorney   |
| 11  |                       |     | Attorneys for Defendant   |
| 12  |                       |     |   |
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## **ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including July 31, 2025, to respond to Plaintiff's Motion for Attorney Fees.

Dated: July 2, 2025

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE